



Solutia Inc.  
702 Clydesdale Avenue  
Anniston, Alabama 36201 USA

May 10, 2022

Ms. Pamela J. Langston Scully, P.E.  
Remedial Project Manager  
United States Environmental Protection Agency, Region IV  
Atlanta Federal Center  
61 Forsyth St.  
Atlanta, GA 30303-8960

**RE: April 2022 Progress Report  
Anniston PCB Site (Docket No. 1:02-cv-0749-KOB)  
Anniston, Alabama**

Dear Ms. Langston Scully:

Please find attached the April 2022 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia LLC (collectively P/S) and the United States Environmental Protection Agency (EPA) entered by the United States District Court for the Northern District of Alabama (Court) on August 4, 2003, the Consent Decree for Remedial Design/Remedial Action for Operable Unit No. 3 between P/S and the EPA entered by the Court on April 17, 2013, and the Consent Decree for Remedial Design/Remedial Action for Operable Unit Nos. 1 and 2 between P/S and the EPA entered by the Court on March 26, 2021. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of April 1, 2022, through April 30, 2022. The report also describes upcoming developments anticipated for the months of May and June 2022.

If you should have any questions concerning this matter or need additional information, please call me at (256) 231-8404.

Sincerely,

E. Gayle Macolly  
Manager, Remedial Projects  
Solutia Inc.

Attachments

cc: Ms. Sonja Favors (ADEM)  
Mr. Thomas Dahl



**APRIL 2022 PROGRESS REPORT**

**ANNISTON PCB SITE**

**(DOCKET NO. 1:02-cv-0749-KOB)**

**ANNISTON, ALABAMA**

USEPA I.D. No. ALD 004 019 048

Submitted For:

**Solutia Inc. and Pharmacia LLC**

**702 Clydesdale Avenue**

**Anniston, Alabama 36201**

May 10, 2022

## TABLE OF CONTENTS

<b><u>SECTION</u></b>	<b><u>PAGE</u></b>
<b>1.0 INTRODUCTION.....</b>	<b>1</b>
1.1 2003 PARTIAL CONSENT DECREE.....	1
1.2 2013 OPERABLE UNIT 3 (OU-3) REMEDIAL DESIGN/REMEDIAL ACTION CONSENT DECREE.....	1
1.3 2021 OPERABLE UNIT 1/ OPERABLE UNIT 2 (OU-1/OU-2) REMEDIAL DESIGN/REMEDIAL ACTION CONSENT DECREE .....	2
<b>2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD.....</b>	<b>3</b>
2.1 GENERAL 2003 CD ACTIVITIES.....	3
2.1.1 Administrative Submittals .....	3
2.2 OPERABLE UNIT 1/OPERABLE UNIT 2 (OU-1/OU-2).....	3
2.2.1 Residential Removal Properties Program .....	3
2.2.1.1 Residential Removal Access .....	3
2.2.1.2 Residential Removal Activities .....	4
2.2.2 OU-1/OU-2 Non-Residential Program .....	4
2.2.3 11 <sup>th</sup> Street Ditch .....	4
2.3 OPERABLE UNIT 4 (OU-4) .....	4
2.4 TECHNICAL ASSISTANCE PLAN GRANT.....	5
2.5 COMMUNITY ADVISORY GROUP.....	5
<b>3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD.....</b>	<b>6</b>
3.1 GENERAL OU-3 RD/RA CD ACTIVITIES.....	6
3.1.1 Administrative Submittals .....	6
3.2 REMEDIAL ACTION .....	6
<b>4.0 OU-1/OU-2 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD</b>	<b>7</b>
4.1 GENERAL OU-1/OU-2 RD/RA CD ACTIVITIES.....	7
4.1.1 Administrative Submittals .....	7
4.1.2 OU-1/OU-2 Non-Residential Program .....	7

<b>5.0</b>	<b>WORK SCHEDULED .....</b>	<b>8</b>
5.1	2003 CD WORK ACTIVITIES .....	8
5.2	OU-3 RD/RA CD WORK ACTIVITIES .....	9
5.3	OU-1/OU-2 RD/RA CD WORK ACTIVITIES .....	9

## TABLES

Table 1 – 2003 Partial Consent Decree Submittal Schedule

Table 2 – Interim IC Group Counts

Table 3 – OU-1 Residential Program Summary

Table 4 – Property Status for Residential Properties with Greater Than 1 ppm PCBs Results for Surface Composite Samples in Zones A – D

Table 5 – OU-4 Residential Program Summary

Table 6 – Property Status for Residential Properties with Greater than 1 ppm PCBs and Less than 400 ppm Lead Results for Surface Composite Samples in OU-4

Table 7 – OU-3 Consent Decree Submittal Schedule

Table 8 – OU-1/2 Consent Decree Submittal Schedule

## **1.0 INTRODUCTION**

### **1.1 2003 Partial Consent Decree**

This monthly progress report has been prepared in accordance with the requirements of the 2003 Partial Consent Decree (2003 CD) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia LLC (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003 (Docket No. 1:02-cv-0749-KOB). The 2003 CD was issued under Sections 106, 107, and 113(g)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§9606, 9697, §9613(g)(2). The 2003 CD provides for the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site) as defined by the 2003 CD. Solutia and Pharmacia, with Monsanto performing work on behalf of Pharmacia, are referred to as “P/S” in the subsequent sections of this report.

In accordance with Appendix A Section XIII (47), Appendix B Task 2, and Appendix G Section VI (2.5) of the 2003 CD, Section 2.0 of this report describes the work performed during the period of April 1, 2022 and April 30, 2022, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.1 of this report also describes upcoming developments anticipated over the next two months for the work required by the 2003 CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

### **1.2 2013 Operable Unit 3 (OU-3) Remedial Design/Remedial Action Consent Decree**

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 3 (OU-3 RD/RA CD) between the EPA and P/S was entered by the Court on April 17, 2013 (Docket No. 1:02-cv-0749-KOB). The OU-3 RD/RA CD, which encompasses the Solutia plant and the adjacent closed South and West Landfills, provides for the implementation of the remedies selected for OU-3 as described in the Interim Record of Decision (IROD) issued by Region 4 of the EPA on September 29, 2011.

In accordance with Section X. Paragraph 31 of the OU-3 RD/RA CD, Section 3.0 of this report describes the work performed for the OU-3 RD/RA during the period of April 1, 2022 and April

30, 2022, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.2 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-3 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

### **1.3 2021 Operable Unit 1/ Operable Unit 2 (OU-1/OU-2) Remedial Design/Remedial Action Consent Decree**

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 1/Operable Unit 2 (OU-1/OU-2 RD/RA CD) between the EPA and P/S was entered by the Court on March 26, 2021 (Docket No. 1:02-cv-00749-KOB). The OU-1/OU-2 RD/RA CD provides for the implementation of the remedies selected for OU-1/OU-2 as described in the OU-1/OU-2 Record of Decision issued by Region 4 of the EPA on November 9, 2017. This includes remedial actions for soils, sediments and groundwater at residential and non-residential properties outside of the plant site (OU-3).

In accordance with the OU-1/OU-2 RD/RA CD Scope of Work (Appendix B Paragraph 5.1), Section 4.0 of this report describes the work performed for the OU-1/OU-2 RD/RA CD during the period of April 1, 2022 and April 30, 2022, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.3 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-1/OU-2 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

## **2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD**

### **2.1 General 2003 CD Activities**

#### **2.1.1 Administrative Submittals**

A 2003 CD submittal schedule for the Site that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 1. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

### **2.2 Operable Unit 1/Operable Unit 2 (OU-1/OU-2)**

#### **2.2.1 Residential Removal Properties Program**

The residential program consists of residential work associated with the 2003 CD. This includes the non-time critical (NTC) residential activities as well as time critical residential activities associated with the Administrative Order on Consent (AOC), effective October 5, 2001.

During this reporting period, P/S continued to work with the local municipalities and property owners to implement the approved NTC Removal Action Interim Institutional Control Program for Residential Properties (Interim IC Program). Table 2 provides a summary of the number of properties in each IC group.

##### **2.2.1.1 Residential Removal Access**

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. During this reporting period, there were no access activities.

Currently there are 12 residential properties in the Residential Removal Properties Program where access has not been granted. The properties are summarized in Table 3, and a description of each property's status is presented in Table 4.

#### **2.2.1.2 Residential Removal Activities**

During this reporting period, P/S did not perform any surface or depth sampling associated with residential removal properties in Evaluation Areas 1-35 and Zones A and B.

#### **2.2.2 OU-1/OU-2 Non-Residential Program**

P/S continued to perform the required routine inspections of the Central Staging and Soil Management Area (CSSMA) and South Staging and Soil Management Area (SSSMA) during this reporting period. No adverse findings were noted during the inspections.

During this reporting period, P/S was notified by Spire Inc. of one additional line retirement location associated with the most recent phase of their project in the Anniston and Oxford areas. This work is scheduled to be completed in May 2022 and will be documented in the project summary report that P/S are currently preparing for submittal to the EPA.

During this reporting period, P/S continued providing construction support to the developer for the Quintard Mall redevelopment project in accordance with the EPA approved Quintard Mall Support Work Plan and associated updates. This project is expected to be completed by July 2022.

During this reporting period, P/S continued providing construction support for the Alabama Power Company (APCO) fiber optic project. This project is expected to be completed in August 2022.

#### **2.2.3 11<sup>th</sup> Street Ditch**

P/S will perform the next quarterly routine inspections in June 2022.

### **2.3 Operable Unit 4 (OU-4)**

During this reporting period, P/S did not perform any surface or depth sampling associated with residential removal properties in OU-4. Residential properties are summarized in Table 5.

Currently there is one residential property in the OU-4 Residential Removal Properties Program where access has not been granted. A description of the removal property's status is presented in Table 6.



P/S are currently working with the Anniston Water Works and Sewer Board to determine the schedule for the last phase of construction support for the Dewatering Facility project at the Choccolocco Creek Waste Water Treatment Plant in accordance with the approved construction support work plan.

On June 21, 2021, P/S submitted the OU-4 Feasibility Study (FS) to the EPA. Comments were received from the EPA on October 28, 2021. P/S submitted a revised OU-4 FS on April 26, 2022. EPA approval is pending.

#### **2.4 Technical Assistance Plan Grant**

The Technical Advisor, Mr. Bertrand Thomas, P.G., continues to review Site-related documents and convey information from these documents to the CAG and the community.

#### **2.5 Community Advisory Group**

There was no CAG meeting scheduled for April. The next CAG meeting is scheduled for May 10, 2022 and will be held via video teleconference.

On April 13, 2022, P/S gave part two of a four-part presentation on the OU-4 FS to the CAG members. The presentation was held via video conference.

### **3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD**

#### **3.1 General OU-3 RD/RA CD Activities**

##### **3.1.1 Administrative Submittals**

A CD submittal schedule for OU-3 that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 7. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

#### **3.2 Remedial Action**

On April 13, 2022, P/S submitted the 2021 Annual Groundwater Detection Monitoring and Corrective Action Effectiveness Report to the EPA. This report documents the results of groundwater monitoring and corrective action during 2021 in accordance with the IROD.

On January 22, 2021, P/S received comments from the EPA on the OU-3 Seep Investigation Report. P/S submitted a response to comments and a revised OU-3 Seep Investigation Report on June 10, 2021. On October 18, 2021, P/S, the EPA and the Special Master for the Court held a video conference to discuss groundwater pumping as a seep mitigation strategy, which was proposed by EPA in their January 22, 2021 comments to the OU-3 Seep Investigation Report. On April 15, 2022, P/S submitted the Cell 3E Seep Groundwater Modeling Study of Potential Upgradient Capture for Seep Mitigation Report. This focused groundwater modeling study was performed as suggested by the EPA in the January 22, 2021 comment letter and later refined during the October 18, 2021 video conference. EPA approval is pending.

#### **4.0 OU-1/OU-2 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD**

##### **4.1 General OU-1/OU-2 RD/RA CD Activities**

###### **4.1.1 Administrative Submittals**

A CD submittal schedule for the OU-1/OU-2 RD/RA CD that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 8. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

On November 9, 2021, P/S submitted the Pre-Design Investigation Work Plan (PDIWP) that includes an integrated Field Sampling Plan and Quality Assurance Plan. Comments were received from the EPA on January 7, 2022. P/S submitted a revised PDIWP on March 7, 2022. EPA approval is pending.

###### **4.1.2 OU-1/OU-2 Non-Residential Program**

There was no activity during this reporting period.

## **5.0 WORK SCHEDULED**

### **5.1 2003 CD Work Activities**

During the months of May and June 2022, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling and removal activities in OU-1/OU-2 according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site (as necessary);
- Perform surface, depth, indoor dust and/or crawl space sampling of residential properties in OU-1/OU-2 as access is provided (as necessary);
- Perform residential removal activities according to the associated work plans (as necessary);
- Prepare and submit Addendum No. 7 to the NTC Removal Action Completion Report for Residential Properties to document residential activities during 2021;
- Prepare and submit the SSSMA, Interim Closure – 2021 Annual Effectiveness Report;
- Prepare and submit the CSSMA 2021 Annual Effectiveness Report;
- Perform CSSMA and SSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan, the approved SSSMA Operating and Closure Plan, and the SSSMA Interim Operations and Maintenance Plan;
- Perform 11<sup>th</sup> Street Ditch inspection and maintenance requirements in accordance with approved schedule;
- Provide construction support for the Quintard Mall redevelopment project (as necessary);
- Provide construction support for the APCO fiber optic line project (as necessary);
- Provide construction support for the Spire Inc. gas line replacement project (as necessary);
- Prepare and submit the construction support summary report for the Spire Inc. gas line replacement project;
- Provide construction support for the Dewatering Facility project at the Choccolocco Creek Waste Water Treatment Plant (as necessary);
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval; and
- The CAG will hold a regularly scheduled meeting on May 10, 2022.

## **5.2 OU-3 RD/RA CD Work Activities**

During the months of May and June 2022, the following work elements are anticipated:

- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval.

## **5.3 OU-1/OU-2 RD/RA CD Work Activities**

During the months of May and June 2022, the following work elements are anticipated:

- Obtain and/or process access for performing the Pre-Design Investigation; and
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval

## **TABLES**

**TABLE 1**  
**PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

**Administrative Issues**

**Reports**

Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA <b>Approval Pending</b>	May 2, 2012
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site	Submitted to EPA <b>Comments Received</b> <b>Revision Submitted</b>	July 31, 2012 May 16, 2013 November 12, 2015
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 1	Submitted to EPA	August 3, 2016
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 2	Submitted to EPA	July 14, 2017
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 3	Submitted to EPA	June 4, 2018
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 4	Submitted to EPA	June 26, 2019
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 5	Submitted to EPA	April 24, 2020
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 6	Submitted to EPA <b>Approval Pending</b>	June 9, 2021
South Staging and Soil Management Area, Interim Closure Report - Addendum No. 7	Submitted to EPA <b>Approval Pending</b>	June 4, 2018
West 11th Street Sewer Line Repair Construction Completion Report - City of Anniston Water Works and Sewer Board	Submitted to EPA <b>Approval Pending</b>	June 12, 2018
Snow Street Drainage Improvement Project Completion Report Closure Report - Addendum No. 1	Submitted to EPA <b>Approval Pending</b>	July 10, 2019
OU-4 Sediment Stability Technical Memorandum	Submitted to EPA <b>Approval Pending</b>	June 30, 2010
Former Holiday Inn Redevelopment Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	November 20, 2013
Miracle Field Construction Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	June 19, 2014
Anniston Regional Airport Fence Installation Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	July 23, 2014
Interstate 20 (I-20) Bridge System Over Snow Creek Remedial Measures Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	October 7, 2014
Colonial Pipeline Company Recoating Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	November 5, 2014
Operable Unit 4 Feasibility Study	Submitted to EPA <b>Comments Received</b> <b>Revision Submitted</b> <b>Approval Pending</b>	June 21, 2021 October 28, 2021 April 26, 2022
March 2022 Progress Report	Submitted to EPA	April 11, 2022

**Work Plans**

Notes:

<sup>(1)</sup> The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-4.

**TABLE 2**

**INTERIM IC GROUP COUNTS  
ANNISTON PCB SITE  
Anniston, Alabama**

<b>Area</b>	<b>IC Group 2<sup>1</sup></b>	<b>IC Group 3<sup>2</sup></b>	<b>IC Group 4<sup>3</sup></b>	<b>Total</b>
OU-1/2	317	99	48	<b>464</b>
OU-4	12	5	1	<b>18</b>
<b>Total</b>	<b>329</b>	<b>104</b>	<b>49</b>	<b>482</b>

<sup>1)</sup> IC Group 2 includes properties where residual PCB-containing soil may remain on the property but such presence has not been confirmed (e.g., PCBs beneath structures or driveways).

<sup>2)</sup> IC Group 3 includes properties where PCB levels in the surficial soil are less than 1 ppm, but are between 1 and 10 ppm at 12 inches or more below the existing ground surface. IC Group 3 properties may also include improvements (e.g., houses, driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed.

<sup>3)</sup> IC Group 4 includes properties where PCB levels in the surficial soil are greater than 1 ppm and have not been remediated (due to access issues or unsuitable areas). IC Group 4 properties may also include improvements (e.g., houses or driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed, and/or the property may contain PCBs between 1 and 10 ppm at 12 inches or more below the existing ground surface.

IC: Institutional Controls

PCBs: polychlorinated biphenyls

ppm: parts per million



TABLE 3

## OU-1 RESIDENTIAL PROGRAM SUMMARY

## ANNISTON PCB SITE

Anniston, Alabama

<b>Residential Removal Action Program (Lead Site AOC Zone C and D) <sup>(1)</sup></b>	<b>April 2022</b>
No. of properties where access has been requested to surface sample	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust, and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm</b>	<b>1214</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm <sup>(2)(3)</sup></b>	<b>10</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>19</b>
<b>Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)</b>	<b>10</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD) <sup>(3)(4)</sup></b>	<b>369</b>
<b>Total no. of &gt; 1 ppm PCBs removal action properties completed by EPA (confirmed)</b>	<b>8</b>
<b>Residential Removal Action Program (Lead Site AOC Zone C and D)</b>	<b>April 2022</b>
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or demo samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm in High Activity Areas</b>	<b>24</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>9</b>
<b>Residential Removal Action Program (Lead Site AOC Zone A)</b>	<b>April 2022</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>	<b>440</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>	<b>1</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>81</b>
<b>Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)</b>	<b>2</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>2</b>

**TABLE 3**  
**OU-1 RESIDENTIAL PROGRAM SUMMARY**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Residential Removal Action Program (Lead Site AOC Zone B)</b>	<b>April 2022</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>	<b>525</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>	<b>1</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>120</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>3</b>

Notes:

<sup>(1)</sup>Lead Site AOC Zones C and D represents Evaluation Areas 1-34. Properties in Evaluation Area 35 have been moved to OU-4.

<sup>(2)</sup> Includes properties surface sampled by EPA. Does not include completed removal properties or EPA Lead Site Appendix 6 properties.

<sup>(3)</sup> This total includes three properties where removals have previously been completed, but additional removals are required.

<sup>(4)</sup> This total includes 3 Appendix 6 properties within Lead Site AOC Zones C and D where removals were completed by Solutia.

TABLE 4

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN ZONES A - D  
ANNISTON PCB SITE  
Anniston, Alabama**

ADDRESS	GIS PARCEL ID	EVALUATION AREA	EPA Zone	PROPERTY STATUS
918 McDaniel Avenue	2217	11	D	Non-Responsive
621 Pine Street <sup>(2)</sup>	2820	3	C	Non-Responsive
1407 Glen Addie Avenue <sup>(2)</sup>	765	24	C	Non-Responsive
509 W. 13th Street	1136	24	C	Non-Responsive
916 McDaniel Avenue	2254	11	D	Owner Declined Access During Removal Initiation
124 W. 18th Street	207123	-	A	Owner Declined Access During Removal Initiation
1627 W. 13th Street	1061	21	C	Owner Declined Removal Access
2106 W. 10th Street	2128	15	D	Owner Declined Removal Access
3002 Jefferson Street	3410	-	B	Owner Declined Removal Access
807 Bancroft Avenue	2443	34	D	Owner Declined Removal Access
716 Montrose Avenue <sup>(2)</sup>	2500	11	D	Owner Not Found
Duncan Avenue (11-22-01-01-04-2-77) <sup>(1)</sup>	973	21	C	Owner Not Found

Notes:

<sup>(1)</sup> Portions of property are no longer unsuitable for removal.

<sup>(2)</sup> Property requires additional removal action.

**TABLE 5**  
**OU-4 RESIDENTIAL PROGRAM SUMMARY**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Residential Removal Action Program</b>	<b>April 2022</b>
No. of properties where access has been requested to surface sample	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust, and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm</b>	<b>39</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm</b>	<b>1</b>
<b>Total no. of removal action properties completed by Solutia</b>	<b>19</b>

**TABLE 6**

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN OU-4  
ANNISTON PCB SITE  
*Anniston, Alabama***

ADDRESS	GIS PARCEL ID	PROPERTY STATUS
0 Howard Drive (07-06-14-0-000-004.00)	600117	Owner Declined Removal Access

TABLE 7

**OU-3 CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

---

**Administrative Issues**


---

**Reports**


---

OU-3 Construction Completion Report	Submitted to EPA	January 22, 2018
OU-3 Construction Completion Report Addendum	Submitted to EPA <b>Approval Pending</b>	July 27, 2018
OU-3 Operations and Maintenance Plan for Remedial/Corrective Action Projects	Submitted to EPA <b>Revision Submitted</b> <b>Approval Pending</b>	August 7, 2018 August 31, 2021
OU-3 Seep Investigation Report	Submitted to EPA <b>Comments Received</b> <b>Revision Submitted</b> <b>Approval Pending</b>	August 31, 2020 January 22, 2021 June 10, 2021
Cell 3E Seep Groundwater Modeling Study of Potential Upgradient Capture for Seep Mitigation	Submitted to EPA <b>Approval Pending</b>	April 15, 2022
2021 Annual Groundwater Detection Monitoring and Corrective Action Effectiveness Report	<b>Submitted to EPA</b>	April 13, 2022

**Work Plans**


---

Seep Investigation: Interim Results and Updated Work Plan	Submitted to EPA <b>Approval Pending</b>	November 25, 2019
OU-3 Institutional Control Implementation and Assurance Plan: Rev 2.0	Submitted to EPA <b>Approval Pending</b>	September 30, 2021

**TABLE 8**

**OU-1/OU-2 CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

Item	Relevant Section of CD/SOW	Timeline for Completion	Actual Completion	Approval
<b>RD Schedule</b>				
Identify the Supervising Contractor	CD VI.9	10 days after Effective Date	April 5, 2021	April 16, 2021
Financial Assurance Mechanism	CD IX.27	Within 10 days after Effective Date	April 12, 2021	May 24, 2021
Financial Assurance Documentation	CD IX.27	30 days following USEPA approval of financial assurance method (June 23, 2021)	June 18, 2021	--
Submit Draft RDWP, HASP, and ERP	SOW 3.1	Within 60 days following receipt of USEPA's Authorization to Proceed regarding the Supervising Contractor (June 15, 2021)	June 15, 2021	--
Submit Revised RDWP, HASP, and ERP	SOW 3.1	Within 30 days following receipt of USEPA's Comments on the Draft RDWP, HASP and ERP (July 20, 2021)	August 19, 2021	September 10, 2021
Submit Draft PDIWP and QAPP	SOW 3.3(a)	60 days following USEPA approval of RDWP	November 9, 2021	--
Submit Revised PDIWP and QAPP	SOW 3.3(a)	60 days following receipt of USEPA comments on January 7, 2022 (March 8, 2022)	March 7, 2022	
Preliminary (30%) Design	SOW 3.3(a), 3.4	120 days following USEPA approval of PDI Report		
Pre-Final (90%/95%) Design	SOW 3.5	150 days following USEPA comments on 30% Design		
Final (100%) Design	SOW 3.6	60 days following USEPA comments on 95% Design		
Draft Notice to Successors-In-Title	CD VIII.23.a	15 days after Effective Date	April 12, 2021	June 2, 2021
Record Notice to Successors-In-Title	CD VIII.23.a	Within 10 days after USEPA approval of draft notice	June 3, 2021	--
Certified Copies of Notices to Successors-In-Title	CD VIII.23.a	Within 10 days after recording notices	June 9, 2021	--
Submit certificates of insurance naming USEPA as an additional insured	CD XI.41	15 days prior to commencing on-site Work		

**TABLE 8**

**OU-1/OU-2 CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Item</b>	<b>Relevant Section of CD/SOW</b>	<b>Timeline for Completion</b>	<b>Actual Completion</b>	<b>Approval</b>
Identify a Community Involvement Coordinator (if requested)	-	15 days following USEPA request		



TABLE 8

**OU-1/OU-2 CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

Item	Relevant Section of CD/SOW	Timeline for Completion	Actual Completion	Approval
<b>RA Schedule</b>				
Award RA Contract	-	120 days after USEPA Notice of Authorization to Proceed with RA		
Submit RAWP	SOW 4.1	Submit within Award of RA Contract		
Designate IQAT	SOW 4.2	-		
Pre-Construction Conference	SOW 4.3(a)	Within 30 days after approval of RAWP		
Start of Construction	-	Within 60 days after approval of RAWP		
Completion of Construction	SOW 4.6(b)	as described in approved RAWP		
Pre-Final Inspection	SOW 4.6(b)	Within 14 days following completion of construction		
Pre-Final Inspection Report	SOW 4.6(d)	Within 14 days following completion of Pre-Final Inspection		
Final Inspection	SOW 4.7	Within 14 days following completion of work identified in Pre-Final Inspection Report		
RA Report	SOW 4.6(d)	60 days following final inspection		
Monitoring Report	SOW 4.7(b)	to be determined		
Work Completion Report	SOW 4.9(b)	to be determined		
Periodic Review of Support Plan	SOW 4.8	for Five-Year Reviews, triggered by start of first RA on 6/8/2015		

## Notes:

Effective date is March 26, 2021.

--: not applicable

CD: consent decree

ERP: emergency response plan

HASP: health and safety plan

IQAT: independent quality assurance team

PDI: predesign investigation

PDIWP: predesign investigation work plan

QAPP: quality assurance project plan

RA: remedial action

RAWP: remedial action work plan

RD: remedial design

RDWP: remedial design work plan

SOW: statement of work

USEPA: United States Environmental Protection Agency